

**EXHIBIT A**  
**Summons and Complaint**

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	THE SIXTH JUDICIAL CIRCUIT
COUNTY OF LANCASTER	)	
	)	Case No. 2020-CP-29-
ADAM L. BRADO,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	<b>SUMMONS</b>
	)	(JURY TRIAL REQUESTED)
	)	
RIKHEEM A. LOWERY AND HAVERTY	)	
FURNITURE COMPANIES, INC.,	)	
	)	
Defendant(s).	)	

TO THE DEFENDANT(S) ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to the said Complaint on the subscriber hereof at his office within thirty (30) days after the service hereof, exclusive of the day of such service; and if you fail to answer the Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for a judgment by default to be rendered against you for the relief demanded in the Complaint.

November 2, 2020

Lancaster, SC

DAVID BLACKWELL LAW, LLC

s/ David R. Blackwell

David R. Blackwell

Attorney for Plaintiff

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	)	THE SIXTH JUDICIAL CIRCUIT
COUNTY OF LANCASTER	)	
		Case No. 2020-CP-29-
ADAM L. BRADO,	)	
	)	
Plaintiff,	)	
	)	<b>COMPLAINT</b>
Vs.	)	(JURY TRIAL REQUESTED)
	)	
RIKHEEM A. LOWERY AND HAVERTY	)	
FURNITURE COMPANIES, INC.,	)	
	)	
Defendant(s).	)	

The Plaintiff, complaining of the Defendants, alleges:

1. The Plaintiff is a resident and citizen of Lancaster County, South Carolina.
2. Upon information and belief, the Defendant Rikheem A. Lowery (Hereinafter "Lowery") is a resident and citizen of the State of North Carolina.
3. Upon information and belief, Defendant Haverty Furniture Companies, Inc. (Hereinafter "Haverty") is a Foreign Corporation doing business in Lancaster County, South Carolina.
4. On or about July 16, 2019, the Plaintiff riding a scooter South on private property (Walnut Creek Parkway). Defendant Lowery was driving a box truck owned by Defendant Haverty and was stopped at a stop sign headed East on private property (McAlister Court). Defendant Lowery failed to yield the right of way and pulled out in front of Plaintiff. Plaintiff swerved left to avoid Defendant Lowery and crashed his scooter into the sidewalk.
5. At all times relevant, Defendant Lowery was an employee and/or agent for Defendant Haverty.
6. The injuries and damages as hereinafter set forth were caused by the negligent and reckless conduct of Defendant Lowery in the following particulars:

- a. In failing to keep a proper lookout;
  - b. In failing to keep his vehicle under proper control;
  - c. In failing to keep the proper distance between his vehicle and the vehicle of the Plaintiff;
  - d. In failing to properly obey the stop traffic control sign by not remaining stopped and waiting for the Plaintiff, who had the right-of-way, to clear the intersection;
  - e. In failing to exercise that degree of care which a reasonably prudent person would have exercised under the same or similar circumstances.
7. By reason and in consequence of the aforesaid acts and/or omissions of the Defendant Lowery, the Plaintiff suffered a broken collar bone and injuries to his head, hip and other parts of his body; that his injuries were of such nature as to require him to expend monies for hospital treatment, doctors' care, and other medical necessities; that at all times since the happening of the accident, Plaintiff has suffered significant pain and mental anguish, all to his damage in an appropriate amount.

**WHEREFORE**, Plaintiff prays that judgment be rendered against Defendants for actual and punitive damages in an appropriate amount, and for the costs of this action.

November 2, 2020

Lancaster, SC

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s/ David R. Blackwell

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